

Title: Compliance Education and Training Policy	Reference Number: HQ 5.1.02
Signature: Chief Compliance Officer	Effective Date: 2/15/2023
Approved by: Chief Compliance Officer	Page #: Page 1 of 2
<input checked="" type="checkbox"/> Health Quest Systems, Inc. <input checked="" type="checkbox"/> Northern Dutchess Hospital <input checked="" type="checkbox"/> Putnam Hospital Center <input checked="" type="checkbox"/> Sharon Hospital <input checked="" type="checkbox"/> Vassar Brothers Medical Center <input checked="" type="checkbox"/> Heart Center <input checked="" type="checkbox"/> HQ Home Care <input checked="" type="checkbox"/> HQ Medical Practice <input checked="" type="checkbox"/> Sharon Hospital Medical Practice <input checked="" type="checkbox"/> Thompson House <input checked="" type="checkbox"/> Other HQ Entities Not Listed Above	

PURPOSE:

To comply with regulatory requirements requiring Health Quest System’s Inc. and its affiliates (“HQ”) to have “written policies and procedures that...implement the operation of a compliance program”¹ and to provide regular, effective compliance training and education to all appropriate Workforce Members. It is required that all training program elements meet requirements of all applicable laws, regulations, requirements, and company policies.

POLICY:

- It is the policy of HQ to implement a robust Compliance Training and Education program (“CTE”) that, among other things, describes compliance expectations, the elements of the Compliance Program, and provides guidance to Workforce Members, in dealing with potential compliance issues. The program also identifies how to communicate compliance issues to appropriate compliance personnel and describes how potential compliance problems are investigated and resolved.”²
- In addition, HQ will provide Compliance training and education as outlined in the “Health Quest Corporate Integrity Agreement (“CIA”) Training Plan” annually, during each Reporting Period, to include the following:
 - Covered Persons
 - Health Quest’s CIA requirements,
 - Applicable Federal and state health care program requirements,
 - Requirements of the Anti-Kickback Statute,
 - The Stark Law.
 - Members of the Nuvance Health Board of Directors
 - Corporate governance responsibilities of board members,
 - Responsibilities of Board members with respect to review and oversight of the Compliance program,
 - Unique responsibilities of health care Board members, including the risks, oversight areas, and strategic approaches to conducting oversight of a health care entity.

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ENFORCEMENT:

All employees are expected to complete assigned training modules or to attend any training assigned. Any employee failing to comply with this policy will be subject to appropriate remedial and/or disciplinary action, up to and including termination of any employment or other relationship, in accordance with this policy.

DEFINITIONS:

Workforce Member: Any employee, independent contractor, agent, volunteer, trainee or other person who performs work for, or on behalf of HQ. This includes full-time, part-time, and pool employees; associates; directors; officers; managers; supervisors; volunteers; members the Nuvance Health Board of Directors (“Board”) and members of standing committees; medical staff employed by, or otherwise affiliated with HQ; affiliated students or others receiving training at any HQ facility; and others who provide goods or services to HQ.

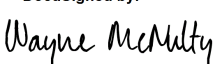
REFERENCES:

- ¹NYS Office of the Medicaid Inspector General, Compliance Program Review Guidance (2016). 18 NYCRR 521.3 (c) (1).
- ²NYS Office of the Medicaid Inspector General, Compliance Program Review Guidance (2016). 18 NYCRR 521.3 (c) (3).
- HQ5.1.02 Compliance Training and Education Procedure
- Health Quest Corporate Integrity Agreement Training Plan, Reporting Period 1.

POLICY HISTORY:

- Supersedes: 3/5/2020
- Original Implementation Date: 1/19/2017
- Date Reviewed: 2/9/2023
- Date Revised: 6/13/2018, 3/13/2019, 3/5/2020, 3/2/2021, 2/1/2022, 2/9/2023

APPROVAL:

DocuSigned by:  <small>CB154254B6B0441...</small>	2/17/2023
Policy Owner	Date